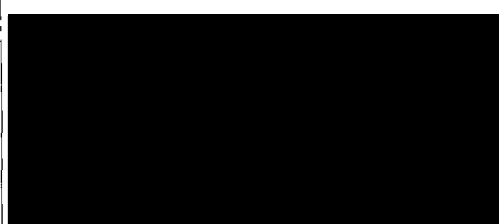


2-6




Syntex Verona
No 0007452154
break: 10.4
Other: N/D

State of Missouri)
County of GREENE) ss:

Clifford Garner, being duly sworn deposes and says:

1. I have personal knowledge of the matters hereinafter referred to and make this affidavit.

2. I worked for Hoffman Taft, Inc., from April 27, 1970 until September 16, 1970. Then I went to work for NEPACCO until August 1972.

 and then went back to work at Hoffman Taft. I hauled NEPACCO waste to a Syntex dump site. This was a clay material used to filter hexachlorophene through. I hauled the stuff until Rick Bagby stopped me. NEPACCO was a sloppy operation. TCP product was all over floor and real bad leaks were distilling off. We used water hoses to clean up. TCP and dioxin would scrape up. The floor washings went into a waste tank. Different materials went into the waste tank - xylene, toluene, proprionic acid, methanol, beta alanine. We steamed out the kettles when we cleaned.

Every two or three weeks the pipes at NEPACCO would plug up. 10 to 15 feet long black steel pipes. When the pipes were taken down the pumps would leak material and we would scrape it off the floor. The pipes were stacked on Bill Ray's place. I saw 50 pipes up there about two years ago.

3. I saw the material in the waste tank placed in drums. It was a black thickish colored material. Some waste stayed on top and it was a

black gray color. It was placed in 55-gallon drums. Gerald Lechner told me he helped Ronnie Mills move the material. He told me that he took it to the James Denny farm and that he fell in a drum and that it ate up his shoes and pants.

4. Another day I was pumping waste from the kettle to a tank. The pump packing was leaking and it sprayed me in the face and forehead. [REDACTED]

[REDACTED]. One morning when I had been at NEPACCO about a year, a hose connection came loose and I got material on my left leg. Jack Miller's brother ripped off my clothes and I walked naked to the shower building. Jack Miller's brother made me wash for an hour. Bill Ray called me at home and told me the area would burn red and then black. It did. He told me the stuff was not dangerous.

I used to bring gloves home from the Hoffman-Taft facility. They were from the NEPACCO building. [REDACTED]

[REDACTED]

[REDACTED] When he slept with me or used my pillow, he would break out. [REDACTED]

[REDACTED]

In August 1972, [REDACTED]

[REDACTED]

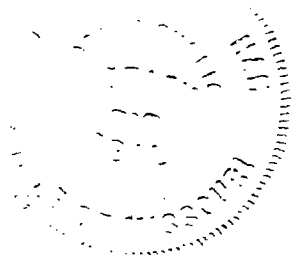
[REDACTED]

[REDACTED]

[REDACTED]

Clifford Garner
(Signature)

Sworn to before this 8TH day of May, 1980



Donna Willingham

Donna Willingham Notary Public
Greene County State of Missouri
My Commission Expires June 14, 1983

00086